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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

19 KPG INVESTMENTS, INC., et al.,
20 Plaintiff,

21 vs.

22 MARLENA SONN, et al.,
23 Defendant.

24 Case No. 3:22-CV-00236-ART-CLB
25 c/w Case No. 3:22-CV-00323 ART-CLB

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**DEFENDANTS ALEXANDRA SARAH
GETTY AND ASG INVESTMENTS,
INC.'S CASE MANAGEMENT
CONFERENCE REPORT**

1 Defendants Alexandra Sarah Getty (“ASG”) and ASG Investments, Inc. (“ASG
2 Investments”) (collectively “ASG Defendants”) hereby submit their Case Management
3 Conference Report in accordance with this Court’s Pretrial Conference Order [ECF No. 152]
4 and the Court’s Civil Standing Order [ECF No. 55].

5 **I. DISCOVERY COMPLETED SINCE LAST CASE MANAGEMENT**
6 **CONFERENCE**

7 Since the April 17, 2024 Pretrial Conference, ASG Defendants have continued in their
8 process to identify and produce relevant and responsive documents and communications. In
9 August 2023, ASG Defendants made their initial production of documents and served discovery
10 responses and objections to Plaintiff Marlena Sonn’s discovery requests. At that time, ASG
11 Defendants were in the process of ongoing collection and review of electronically stored
12 information. Shortly thereafter, as the Court is aware, the parties agreed to a stay and entered into
13 a settlement which Sonn later reneged. During the April 17, 2024 Pretrial Conference, Sonn then
14 suggested a further settlement conference, which she then only caused cancellation of the
15 morning it was scheduled to occur on June 3, 2024.

16 Immediately thereafter, ASG Defendants began working to complete their production of
17 documents that had been paused in August 2023. ASG Defendants conducted extensive ESI
18 searches and, after meeting and conferring with Sonn, finalized a production. Thus, in addition to
19 the production made in August, ASG Defendants communicated to Sonn their intent to produce
20 documents today. As promised, at approximately 7:00 p.m. this evening, ASG Defendants made
21 an additional production of over 4,000 additional pages responsive to Sonn’s Request for
22 Production of Documents, Set One.

23 ASG Defendants also agreed, in correspondence with their production, to make available
24 one or more persons most knowledgeable (PMK) to Sonn’s requested general topics for a Rule
25 30(b)(6) deposition, although ASG Defendants and Sonn are continuing to meet and confer to
26 determine the specific scope and scheduling of the PMK deponents. ASG Defendants anticipate
27 those deponents will be available in August or early September 2024. ASG Defendants requested
28 that Sonn sit for deposition in August 2024. Sonn stated that she was not available until

1 September 2024. The parties ultimately agreed to set Sonn's deposition for September 10, 2024.

2 ASG Defendants further agreed to make ASG available for deposition on September 6, 2024.

3 **II. DISCOVERY SERVED BUT NOT YET COMPLETED**

4 Sonn propounded her first set of Requests for Admission and second set of Interrogatories
5 on ASG Defendants on June 18, 2024. Thus, ASG Defendants' responses are due July 18, 2024.

6 On June 21, 2024, ASG Defendants propounded two sets of Requests for Production of
7 Documents and Requests for Admission to Sonn. Sonn's responses are due July 22, 2024. On
8 June 28, 2024, ASG Defendants propounded Special Interrogatories to Sonn. Sonn's responses
9 are due July 29, 2024. Sonn has not yet responded to any of these requests

10 **III. DISCOVERY ISSUES UNABLE TO RESOLVE THROUGH MEET AND
CONFER**

11 At this time, ASG Defendants do not believe any issues have arisen that cannot be
12 resolved through meet and confer efforts.

13 **IV. OUTSTANDING MOTIONS**

14 ASG Defendants' Renewed Motion to Dismiss [ECF No. 159] has been fully briefed and
15 is ready for consideration by the court.

17 DATED: July 10, 2024

PAUL HASTINGS LLP
in association with
LEMONS, GRUNDY & EISENBERG

20 By: /s/Ryan D. Derry
21 RYAN D. DERRY, *Pro Hac Vice*

22 Attorneys for Defendants,
23 ALEXANDRA SARAH GETTY and
24 ASG INVESTMENTS, INC.

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the law office of PAUL HASTINGS LLP, and on the 10TH day of July, 2024 I electronically filed **DEFENDANTS ALEXANDRA SARAH GETTY AND ASG INVESTMENTS, INC.'S CASE MANAGEMENT CONFERENCE REPORT**, and a copy will be electronically emailed by the United States District Court-District of Nevada through CM/ECF to the following:

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11 Pursuant to FRCP 5(b), I certify that I am an employee of the law office of PAUL
12 HASTINGS LLP, and on the 10TH day of July, 2024, I deposited for mailing in Los Angeles,
13 California a true and correct copy of the foregoing **DEFENDANTS ALEXANDRA SARAH**
14 **GETTY AND ASG INVESTMENTS, INC.'S CASE MANAGEMENT CONFERENCE**
15 **REPORT**, to the following:

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